

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 2:22-cv-203-JRG
)	
MICRON TECHNOLOGY, INC.; MICRON)	JURY TRIAL DEMANDED
SEMICONDUCTOR PRODUCTS, INC.;)	
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	
)	

**DECLARATION OF MICHAEL R. RUECKHEIM IN SUPPORT OF
DEFENDANTS' MOTION TO COMPEL PRODUCTION OF CERTAIN
DOCUMENTS FROM SK HYNIX LITIGATION AND DOCUMENTS
RELATED TO NEGOTIATION OF LICENSE AGREEMENT WITH SK
HYNIX**

I, Michael R. Rueckheim, declare as follows:

1. I am an attorney at the law firm of Winston & Strawn LLP, counsel of record for Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively, “Micron”) in the above captioned matter. I am a member in good standing of the State Bar of Texas. I provide this declaration in support of Micron’s Motion to Compel Certain Documents from the SK hynix Litigation and Documents Related to Negotiation of the SK hynix License. I have personal knowledge of the facts stated herein and could and would testify competently thereto if called as a witness in this matter.

2. A true and correct copy of excerpts from the January 10, 2023 correspondence from Micron’s counsel to Netlist’s counsel is attached as **Exhibit A**.

3. A true and correct copy of excerpts from Chief Administrative Law Judge Charles E. Bullock’s Initial Determination on Violation of Section 337 and Recommended Determination on Remedy and Bond issued in *Certain Memory Modules and Components Thereof, and Prods Containing the Same*, 337-TA-1023 (USITC Nov. 14, 2017) is attached as **Exhibit B**.

4. A true and correct copy of an excerpt from the Commission Opinion in *Certain Memory Modules and Components Thereof*, 337-TA-1089 (USITC Apr. 7, 2020) is attached as **Exhibit C**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on August 7, 2023, in Redwood City, California.

By: /s/ Michael R. Rueckheim
Michael R. Rueckheim